

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

INTELLECTUAL VENTURES I LLC AND  
INTELLECTUAL VENTURES II LLC,

Plaintiffs,

-against-

CITIGROUP, INC., CITICORP, and CITIBANK,  
N.A.,

Defendants.

**14 Civ. 4638 (AKH)**

**ECF CASE**

**JURY TRIAL DEMANDED**

**DEFENDANTS' NOTICE REGARDING INSTITUTION OF  
INTER PARTES REVIEW FOR U.S. PATENT NO. 7,984,081**

Defendants Citigroup, Inc., Citicorp, and Citibank, N.A. (collectively "Citi") hereby provide notice to the Court that on February 11, 2015, the United States Patent & Trademark Office ("USPTO") instituted *inter partes* review ("IPR") of United States Patent No. 7,984,081 ("the '081 Patent") based on a petition for IPR filed by non-party International Business Machines Corporation ("IBM"). The USPTO instituted IPR of Claims 1-4, 10-13, and 21-24 (the "Challenged Claims") of the '081 Patent, and determined that there is a reasonable likelihood that IBM would prevail in showing the Challenged Claims were invalid. *See* Ex. A, IPR2014-01385 (instituting IPR on Claims 1-4, 10-13, and 21-24).

Citi did not participate in, control, support, or pay for the preparation or filing of these petitions. Citi will provide further notice to the Court upon receipt of any information regarding further actions taken by the USPTO.

Dated: June 3, 2015

Respectfully submitted,

*/s/ Brent P. Ray*

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**CERTIFICATE OF SERVICE**

I certify that I caused a true and correct copy of the foregoing document to be served via the CM/ECF system of the U.S. District Court for the Southern District of New York on all counsel of record on June 3, 2015.

*/s/ Brent P. Ray*

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Brent P. Ray